



HUGHES LAW CORPORATION

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Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION**

In re

JAMES L. MACKLIN

Debtor.

) Case No.: 10-44610-E-7

) DCN: GJH - 1

) **APPLICATION OF CHAPTER 7
TRUSTEE TO EMPLOY COUNSEL**

To THE HONORABLE RONALD H. SARGIS, United States Bankruptcy Judge:

Thomas A. Aceituno, the Chapter 7 Trustee ("Trustee") in the above-captioned Chapter 7 case, hereby requests that the Court authorize him to employ Hughes Law Corporation ("HLC") as counsel in the above-captioned case, on the basis of the following facts:

1. Trustee is the duly-appointed Chapter 7 Trustee in the above-captioned case.
2. Trustee believes that he requires legal assistance in carrying out his responsibilities as Trustee in the above-captioned case. Specifically, the Trustee needs general counsel to advise him concerning the general administration of the Debtor's Estate, including but not limited to, the handling of an adversary proceeding initiated by the Debtor concerning a note

1 and deed of trust against the Debtor's residence. The deed of trust was purportedly foreclosed by
2 creditor Deutsche Bank National Trust Co., but the Court has issued a preliminary injunction
3 against Deutsche Bank.

4 3. Trustee has selected HLC to represent him as general counsel in connection with
5 the above-captioned case.

6 4. As general counsel for the Trustee, HLC will advise him concerning the general
7 administration of the Debtor's Estate, including, but not limited to the issues relating to the
8 Debtor's adversary proceeding against Deutsche Bank. If appropriate, counsel will represent the
9 Estate in legal proceedings involving the Estate, including, but not limited to, the Debtor's
10 adversary proceeding against Deutsche Bank.

11 5. Compensation of counsel shall be made pursuant to 11 U.S.C. § 330. HLC has
12 agreed with the Trustee upon payment of the firm's fees on an hourly basis, plus reimbursement
13 of reasonable and necessary costs in accordance with this Court's normal practices. For the
14 Court's reference, during 2011, Gregory J. Hughes' normal hourly rate is \$330, and Christopher
15 Hughes' normal hourly rate is \$185. However, the Trustee is not seeking approval of specific
16 rates at this time.

17 6. Trustee has selected the firm of HLC to represent him because of the expertise of
18 its senior partner, Gregory J. Hughes, in bankruptcy litigation. Trustee believes that HLC is
19 well-qualified to represent him in connection with this case.

20 7. As the Declaration of Gregory J. Hughes submitted herewith demonstrates, HLC
21 has no connection with the Debtor, the creditors, any other party in interest or their respective
22 attorney or accounts, the United States Trustee, or any person employed in the Office of the
23 United States Trustee, that would be adverse to the matters upon which HLC has been engaged.

24 8. HLC has not received a retainer from the Trustee in connection with this case.

25 9. This application is based on the Declaration of Gregory J. Hughes filed in support
26 thereof.

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Dated: June 24, 2011

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